

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

CAIR FOUNDATION, INC., d/b/a
COUNCIL ON AMERICAN-ISLAMIC
RELATIONS, & CAIR,

Plaintiff,

v.

LORI SAROYA,

Defendant.

Civil No.: 0:21-cv-01267 (SRN/TNL)

**DECLARATION OF
STEVEN C. KERBAUGH IN
SUPPORT OF DEFENDANT LORI
SAROYA'S MOTION FOR
DECLARATION THAT NO
PRIVILEGE EXISTS WITH
RESPECT TO A 2014 REPORT
PROVIDED BY CAIR TO HER,
THAT ANY PRIVILEGE HAS BEEN
WAIVED, OR THAT SHE MAY USE
THE REPORT TO PRESENT FACTS
IN THE REPORT IN HER DEFENSE**

I, Steven C. Kerbaugh, hereby state and declare under penalty of perjury:

1. I am an attorney with the law firm Saul Ewing Arnstein & Lehr, LLP. I am one of the attorneys representing Defendant Lori Saroya ("Saroya"). The following is true and correct to be the best of my knowledge, information and belief.

2. Attached hereto are true and correct copies of the following:

Exhibit 1 Letter from Jeffrey Robbins to Cynthia Morgan dated October 31, 2021 [**FILED UNDER SEAL**]; and

Exhibit 2 Letter from Cynthia Morgan to Jeffrey Robbins dated November 3, 2021 [**FILED UNDER SEAL**].

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 23, 2021

s/Steven C. Kerbaugh
Steven C. Kerbaugh